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MEMORANDUM ENDORSED

VIA ELECTRONIC FILING

The Honorable Gabriel W. Gorenstein
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

September 7, 2023

**Re: Request for extension of discovery
*Tyler Erdman v. Adam Victor, et al., No. 20 Civ. 4162***

Dear Judge Gorenstein,

This letter is written to request an extension of the discovery deadline, presently set for September 7, 2023, and for an extension of the deadline for the order required in the case management plan, presently set for September 14, 2023.

Paragraph 1.E of the Court's Individual Rules and Practices states requests for extensions of deadlines must state (1) the date or dates sought to be extended, (2) the number of previous requests for extensions, (3) the reason for the extension, and (4) whether the adversary objects and, if so, the reasons given by the adversary for objecting.

This is the eleventh request for an extension of the discovery deadline. The extension is needed due to the fact there presently exists a date for providing document production information occurring after the overall discovery deadline, and Plaintiff will need time to review the responses required by the Order of the Court dated August 25, 2023. I was finally able to

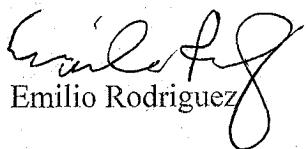
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speak to the Plaintiff late this evening and was able to confirm he does not object, and in fact, joins me in the request for an extension.

This letter proposes a change of the discovery deadline from September 7, 2023, to October 23, 2023. This, in turn, affects the deadline for the order required by the case management plan, presently set for September 14, 2023. We propose changing it to October 30, 2023.

Therefore, Plaintiff and I make this joint request to extend the deadlines for discovery and the order required in the case management plan.

Yours faithfully
Polizzotto & Polizzotto, LLC


Emilio Rodriguez

The discovery deadline is extended to October 23, 2023.
The letter to Judge Schofield as required by paragraph 13.b
of Docket #77 shall be filed by October 30, 2023.

So Ordered.



GABRIEL W. CORENSTEIN
United States Magistrate Judge

September 8, 2023